

UNITED STATES DISTRICT COURT FILED
DISTRICT OF MASSACHUSETTS IN CLERK'S OFFICE

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 05-30002-MAP
) U.S. DISTRICT COURT
) DISTRICT OF MASS
)
 FRANK DEPERGOLA, and)
 ARMANDO BOTTA,)
)
 Defendants.)

GOVERNMENT'S MOTION TO UNSEAL AND SUBMIT REDACTED INDICTMENT


The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, moves this Court, pursuant to Local Rule 7.2, to unseal the Indictment in the above referenced case.

The government further requests that the Indictment be redacted to exclude the name of the victim. As grounds for this motion, the government states that all defendants have been arrested and therefore there is no reason to further seal the Indictment. The reason for providing redacted copies is to protect the ongoing investigation as well as to protect the privacy interests of any victims and government witnesses.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By :

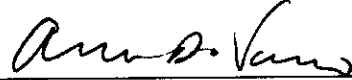

Ariane D. Vuono
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
March 2, 2005

I, Ariane D. Vuono, Assistant U.S. Attorney, do hereby
certify that I have served a copy of the foregoing by mail on all
counsel of record.

A handwritten signature in cursive script, appearing to read "Ariane D. Vuono", is written over a horizontal line.

Ariane D. Vuono
Assistant U.S. Attorney